

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION (DAYTON)**

ART SHY, et al.

Plaintiffs,

vs.

NAVISTAR INTERNATIONAL  
CORPORATION, et al.

Defendants.

Case No. 3:92-CV-00333

District Judge Walter H. Rice

**CLASS REPRESENTATIVES' UNOPPOSED MOTION  
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AGREEMENT  
AND ATTORNEY FEES AND EXPENSES**

Pursuant to Fed. R. Civ. P. 23(e), Class Representatives Richard Zounes, Carl Potts, Miller Rodgers, Robert Bergmann, and Fred Cortright (“Class Representatives”), on behalf of themselves and the settlement class, respectfully move this Court to enter an order granting final approval of a class action settlement and associated Class Counsel attorney fees and expenses. Per Local Rule 7.3, Class Counsel consulted with Defendants, Plaintiff SBC, and Plaintiff International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) before filing this Motion and determined that this Motion is unopposed. The grounds for the Court’s potential granting of this unopposed Motion are included in the accompanying memorandum.

Respectfully submitted,

/s/ W.B. Markovits

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2022, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will provide notice of the filing to all parties of record. Parties may access the filing through the Court's CM/ECF system.

/s/ W.B. Markovits  
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